

## Reference 61

# TNRCC FY2001 RCRIS Compliance Monitoring and Enforcement Log

<b>Site Information:</b> <span style="float: right;">If no EPA ID#, Permit#, or WDW# leave blank</span>		<input type="button" value="Help"/>	
<b>TNRCC ID#:</b> 37946	<b>EPA ID:</b> TXD121488902	<b>Permit #:</b>	<b>WDW #:</b>
<b>Facility Name:</b> AKER GULF MARINE - ARANSAS PASS YARD			
<b>Facility physical address:</b> FM 2725, 2 MILES NORTH OF FM 1069, ARANS		<input type="button" value="Tips"/>	
<b>Facility mailing address:</b> P.O. BOX C; INGLESIDE, TX 78362-1302		<b>County:</b> 205 SAN PATRICIO	
<b>Inspection/Activity Information:</b>			
<b>Facility Type:</b> GNLQG		<b>Inspection/Activity Type:</b> MMC	
<b>Inspection begin date:</b> 01/11/2001		<b>Inspection end date:</b> 01/22/2001	
		<b>Super Sign:</b> 02/09/2001	
<b>Areas of Evaluation:</b>			
<input type="checkbox"/> DGW - TSD - Groundwater		<input checked="" type="checkbox"/> SWR - TNRCC ISW State Rule Only	
<input checked="" type="checkbox"/> GMR Generator - Manifest		<input checked="" type="checkbox"/> SMR - TNRCC State Manifest Requirement Only	
<input checked="" type="checkbox"/> GOR - Generator - Other		<input type="checkbox"/> SGW - TNRCC ISW State Groundwater Contamination	
<input checked="" type="checkbox"/> GLB - Generator - Land Ban		<input type="checkbox"/> UIC - Underground Injection Control	
<input type="checkbox"/> TMR - Transporter - Manifest		<input type="checkbox"/> PER - TNRCC Permit Provisions	
<input type="checkbox"/> TOR - Transporter - Other		<input type="checkbox"/> CAS - Permit or Order Schedules	
<input type="checkbox"/> DCL - TSD - Closure		<input type="checkbox"/> FEA - Penalties	
<input type="checkbox"/> DFR - TSD - Financial		<input type="checkbox"/> WFS - Waste Fees	
<input type="checkbox"/> DMR - TSD Manifest		<input type="checkbox"/> Change Form Attached?	
<input type="checkbox"/> DOR - TSD - Other		<input type="button" value="Help"/>	

**Region/Inspector Info:**

**Region:** 14 Corpus Christi

**Inspector:** SPARR

**Comments:**  
 VERBAL NOV-RESOLVED...

**Date RCVD:**

For RCRIS Data Personnel Only  
 Sequence No.

TNRCC ID#	Pre v Viol	Prev Insp Typ	Prev Insp Date	Viol Area	Viol Class	Rule Type	Rule Citation State	Rule Citation Fed	SNC/ SV	ESC	Enf action	Date Action	Final schedule	Compliance date	Cat
37946				GOR	2	F	335.69(a)(1)(i)	262.34(a)(1)(i)			110	01/22/2001	02/05/2001	02/01/2001	C
37946				GOR	2	F	335.69(a)(2)	262.34(a)(2)			110	01/22/2001	02/05/2001	02/02/2001	B
7946				SWR	3	S	335.9(a)(1)(G)				110	01/22/2001	02/05/2001	02/01/2001	C

Inspector

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 TNRCC  
 FIELD OPERATIONS DIVISION

**TNRCC INDUSTRIAL AND HAZARDOUS WASTE INSPECTION REPORT**  
**LARGE QUANTITY GENERATOR**  
**INSPECTION COVER SHEET**

IHW Reg. No.: 37946 EPA ID No.: TXD121488902  
Name of Company: Aker Gulf Marine - Aransas Pass Yard Telephone No.: 361/776-8161  
Mailing Address: P. O. Box C; Ingleside, Texas 78362-1302  
Site Address: Farm-to-Market Road 2725, 2 miles north of Farm-to-Market Road 1069; Aransas Pass, Texas  
County: San Patricio Type of Industry: Marine Structural Fabrication Services  
Previous Name(s) of Company (if applicable): Gulf Marine Fabricators  
Property Owner (if different than company): N/A

EXEMPTIONS: < 90 Day AccumulationGEN./FAC. CLASSIFICATION (Check all that apply): Industrial ☒ Municipal ☐ Commercial ☐  
Government ☐ Non-Gov't. ☒OPERATIONAL STATUS: Active

Current Waste Management: Generator H, 1, 2  
H = Hazardous Treatment                       
1 = Class 1 Non-hazardous Storage H, 1, 2  
2 = Class 2 Non-hazardous Disposal                       
3 = Class 3 Non-hazardous Transporter                     

Hazardous Waste Units: ☒ C ☐ T ☒ SA ☐ CB ☐ BIF ☐ DPNon-Hazardous Units: ☒ C ☒ T ☐ SI ☐ WP ☐ LT ☐ LF ☐ I ☐ TT ☐ TR ☐ WDW ☐ BIF ☐ MUINSPECTION TYPE: CEI ☒ MMC ☐ SPL ☐ NRR ☐ CME ☐ CSE ☐ CDI ☐ OAM

OTH (insp. reason) 06 = Closure Inspection 22 = Report SPL Results 34 = UIC Inspection  
40 = BIF Inspection 46 = Dept. of Defense 61 = State Inspection  
63 = US/Mexico Border

Inspector's Name and Title Suzanne B. Parr, Environmental InvestigatorInspection Participants Aker Gulf Marine representatives were Mr. Steven Hubbard, Environmental Coordinator and Mr. Hector Martinez, Aker Engineer. TNRCC investigators representing Region 14 were Brad Genzer and Stacy Boultinghouse.Date(s) of Inspection January 11, 2001 January 22, 2001  
(begin) (end)Signed: Suzanne Parr 02/09/2001  
(date)Approved: C. R. [Signature] 2/5/1  
(date)

## TNRCC INDUSTRIAL AND HAZARDOUS WASTE INSPECTION REPORT CONTENTS PAGE for LARGE QUANTITY GENERATORS

- ☒ 1. Compliance Monitoring & Enforcement Log (CMEL) {not archived with report}
- ☐ 2. Enforcement Action Request form (if the case is referred for enforcement)
- ☒ 3. Inspection Cover Sheet
- ☒ 4. Contents Page
- ☒ 5. Letter to Facility: Specify type: Final Letter - Resolved Verbal NOV (NOE, NOV, GenCom ltr)
- ☒ 6. Interoffice Memorandum (IOM)
- ☒ 7. Pre-Inspection Checklist
8. Facility Checklist
- |   |   |
|---|---|
| <input checked="" type="checkbox"/> A-- General Information and Unauthorized Discharges | <input checked="" type="checkbox"/> F-- Recordkeeping and Reporting: LDR          |
| <input checked="" type="checkbox"/> B-- Hazardous Waste Determination and Notification  | <input checked="" type="checkbox"/> G-- International Shipments                   |
| <input checked="" type="checkbox"/> C-- Recordkeeping and Reporting: Manifest System    | <input checked="" type="checkbox"/> H-- Preparedness and Prevention               |
| <input checked="" type="checkbox"/> D-- Recordkeeping and Reporting: Waste Activities   | <input checked="" type="checkbox"/> I-- Contingency Plan and Emergency Procedures |
| <input checked="" type="checkbox"/> E-- LDR Determinations, Treatment and Disposal      | <input checked="" type="checkbox"/> J-- Personnel Training                        |
9. Waste Management Units Checklist
- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Container Storage Area Checklist* | <input type="checkbox"/> Tanks Checklist* |
| <input checked="" type="checkbox"/> Container Storage Area Table      | <input type="checkbox"/> Tanks Table      |
- ☐ 10. Transporters Checklist
- ☐ 11. Ground-Water Monitoring Checklist
- ☐ 12. Underground Injection Control (UIC) Checklist
- ☒ 13. Multi-Media Tracking Form
- ☐ 14. I&HW Change Form
- ☒ 15. Waste Minimization Form
16. Other Supporting Documentation (Attachments)
- |   |   |
|---|---|
| <input checked="" type="checkbox"/> TNRCC Notice of Registration (NOR)<br><u>Attachment 1</u> | <input type="checkbox"/> Sample Analysis Results  |
| <input checked="" type="checkbox"/> Maps, Plans, Sketches: <u>Attachment(s) 2 and 5</u>       | <input type="checkbox"/> Manifests  |
| <input checked="" type="checkbox"/> Photographs: <u>Attachment 3</u>                          | <input checked="" type="checkbox"/> Other: <u>Correspondence from Aker Gulf Marine</u><br><u>Attachment(s) 3, 4 and 5</u> |

\* If more than one section (or table) is included, please indicate here.

Robert J. Huston, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Jeffrey A. Saitas, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

February 9, 2001

Mr. H. Brinson Miles, III  
President and General Manager  
Aker Gulf Marine  
P. O. Box C  
Ingleside, Texas 78362-1302

Re: Compliance Evaluation Investigation at:  
Aker Gulf Marine - Aransas Pass Yard, FM 2725, Aransas Pass, San Patricio County, Texas  
TNRCC ID No.: 37946, EPA ID No.: TXD121488902

Dear Mr. Miles:

On January 11 and 22, 2001, Suzanne Parr of the Texas Natural Resource Conservation Commission (TNRCC) Corpus Christi Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for industrial and hazardous waste. During the investigation the investigator verbally notified you of some apparent instances of noncompliance. You have provided us with information which appears to indicate that these problems have been corrected. No further response from you is necessary concerning this investigation.

Please be advised that a TNRCC Petroleum Storage Tank (PST) compliance investigation was conducted concurrently with the solid waste inspection. The results of the PST investigation will be forthcoming in a separate letter.

The TNRCC appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Parr in the Corpus Christi Region Office at (361) 825-3100.

Sincerely,

A handwritten signature in dark ink, appearing to read "C. Russell Lewis".

C. Russell Lewis  
Waste Section Manager  
Corpus Christi Region Office

CRL/sbp

(Rev. 9/25/00)

REPLY TO: REGION 14 • 6300 OCEAN DR., STE. 1200 • CORPUS CHRISTI, TEXAS 78412-5503 • 361/825-3100 • FAX 361/825-3101

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: [www.tnrcc.state.tx.us](http://www.tnrcc.state.tx.us)

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# **Texas Natural Resource Conservation Commission**

## **Investigation Report**

**Aker Gulf Marine - Aransas Pass Yard**  
**TNRCC ID No. 37946**  
**EPA ID No. TXD121488902**  
**IHW- Compliance Evaluation Investigation**  
**Conducted January 11 and 22, 2001**

### **INTRODUCTION**

On January 11, 2001, I began a solid waste compliance evaluation investigation (CEI) at the referenced facility. On the first day of the investigation I was accompanied by Brad Genzer and Stacy Boultinghouse, Region 14 representatives. Aker Gulf Marine (Aker) was contacted on January 8, 2001, to schedule an appointment for this investigation. Upon arrival on January 11, we were accompanied by Mr. Steven Hubbard, Environmental Coordinator. We began the investigation by reviewing facility records. Mr. Hector Martinez, Aker Engineer, also accompanied us in the afternoon. At the end of the day, we met with Mr. H. Brinson Miles, III, President and General Manager, to discuss what we had reviewed during the day and to schedule an appointment to finish the investigation the following week. No compliance determinations were discussed at this time.

The second appointment, scheduled January 18, 2001, had to be postponed due to inclement weather and muddy conditions, and was then moved to January 22, 2001. We began on January 22, by conducting a field investigation at the Aransas Pass Yard, finishing the investigation with further record reviews. A closing meeting and exit interview were held with Aker representatives Mr. Harl Pruitt, Contracts Manager; Mr. T-Gros, General Yard Superintendent; Mr. Steve Yates, Engineering Manager; and Mr. Steven Hubbard, Environmental Coordinator. Brad Genzer and I were representing the agency. Several areas of concern were discussed (reference summary of alleged violations noted below). Documentation demonstrating that compliance had been achieved was requested within 14 days and was received in the Region 14 offices prior to February 5, 2001.

### **GENERAL FACILITY AND WASTE PROCESS INFORMATION**

Aker Gulf Marine is a fabricator of offshore structures and other petroleum related structures for the oil and gas industry. The Aransas Pass Yard and business office are located on Farm-to-Market Road 2725, two miles north of Farm-to-Market Road 1069 in Aransas Pass, Texas. Aker's Aransas Pass Yard is the site where structural components are fabricated.



## **GENERAL FACILITY AND WASTE PROCESS INFORMATION. cont.**

Aker Gulf Marine - Aransas Pass Yard operates under the less than ninety day accumulation time exemption. Solid waste management units at the facility include: one less than ninety day container storage area (NOR Unit No. 001); one 250 gallon waste oil tank (NOR Unit No. 002); and two Distillation/Solvent Recovery units (NOR Unit Nos. 003 and 004).

At the time of this investigation, the company was in the process of modifying the management of paint and paint related wastes (PPRW), in order to utilize the new management alternatives offered by the "Universal Waste Rules."

## **ADDITIONAL INFORMATION**

Aker Gulf Marine has each of the two sites (the Aransas Pass Yard and the Ingleside Yard) registered as large quantity generators. The Aransas Pass site was the focus of my investigation. TNRCC investigator, Brad Genzer conducted an investigation of the Ingleside facility. Records for both locations are kept in the Aransas Pass offices. Mr. Hubbard is the environmental coordinator for both locations, so the investigations were conducted in conjunction with one another.

Each of the sites were selected for multi-media review. Other regulatory compliance requirements at the Aransas Pass site include water quality, TNRCC Permit No. WQ-03012 and petroleum storage tanks, TNRCC Facility ID No. 52284.

It was noted during the file review conducted prior to this investigation that the regulated entity's housekeeping practices had in the past been unacceptable. During this visit, however, it was noted that the grounds have been cleaned and organized, and housekeeping practices have greatly improved.

## **SUMMARY OF ALLEGED VIOLATIONS NOTED AND RESOLVED**

During the investigation, the following areas of alleged noncompliance were noted:

1. **30 TAC Chapter 335.69(a)(2)/40 CFR 262.34(a)(2) - Accumulation Time;** which states that a generator may accumulate hazardous waste on-site for 90 days without a permit provided that the date upon which accumulation begins is clearly marked and visible for inspection on each container.

**SUMMARY OF ALLEGED VIOLATIONS RESOLVED, cont.**

During the investigation conducted January 22, 2001, the beginning date of accumulation was not indicated on one container of paint waste in the less than 90 day accumulation area.

Aker Gulf Marine provided photographic documentation and tracking data showing that the drum has been properly labeled, as per requirements of the Universal Waste Rules.

2. **30 TAC Chapter 335.112(a)(8)/40 CFR 265.174 - Inspections;** which states that the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

During the investigation conducted January 22, 2001, records reviewed indicated that the Hazardous Waste Accumulation Area/Bulk Tank Storage Areas were inspected weekly and recorded on Pollution Prevention Inspection Reports. The period reviewed, January 2000 through December 2000, however, did not contain weekly inspection reports for the month of August 2000 or the first three weeks in September 2000.

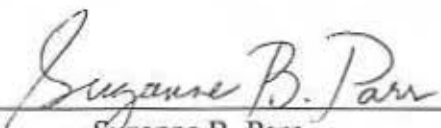
Documentation demonstrating that weekly inspections of the hazardous waste accumulation area had been conducted for the period of August 2000 through September 16, 2000, were submitted to the Region 14 offices on February 1, 2001.

3. **30 TAC Chapter 335.9(a)(1)(G) - Recordkeeping and Annual Reporting Procedures Applicable to Generators;** which states that generators of hazardous or industrial solid waste shall keep records of the location of all hazardous waste accumulation areas.


Neither a written description, nor a diagram of the Aransas Pass Yard identifying the location of all satellite accumulation areas, was available at the time of this investigation.

Aker Gulf Marine submitted to the Region 14 office on February 1, 2001, a site diagram that identifies all satellite accumulation areas in the Aransas Pass Yard.



Signed   
Suzanne B. Parr  
Environmental Investigator  
Region 14 / Corpus Christi

02/09/2001  
Date

Approved   
C. Russell Lewis  
Waste Section Manager  
Region 14 / Corpus Christi

FEB 9, 01  
Date

**Attachments: (in order of final report submittal)**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Data Entry Form/CMEL  | <input checked="" type="checkbox"/> Maps, Plans, Sketches: <u>Attachment 2</u> |
| <input type="checkbox"/> Enforcement Action Request (EAR)   | <input type="checkbox"/> Photographs   |
| <input checked="" type="checkbox"/> Letter to Facility: <u>Final Letter - Resolved Verbal NOV</u> | <input checked="" type="checkbox"/> Container Storage Area Table               |
| <b>Inspection Report</b>  | <input type="checkbox"/> Tanks Table   |
| <input checked="" type="checkbox"/> Summary of Inspection Findings table                          | <input checked="" type="checkbox"/> Correspondence from the facility:          |
| <input type="checkbox"/> CME Checklist  | <u>Attachments 3, 4, and 5</u>   |
| <input type="checkbox"/> UIC Self Reported Data Records Review                                    | Other (specify): _____   |
| <input type="checkbox"/> Sample Analysis Results  | <input checked="" type="checkbox"/> Waste Minimization Checklist               |
| <input type="checkbox"/> Manifests  | <input checked="" type="checkbox"/> Multi-media Tracking Form                  |
| <input checked="" type="checkbox"/> NOR: <u>Attachment 1</u>                                      | <input type="checkbox"/> IHW Change Form                                       |

## TNRCC INDUSTRIAL AND HAZARDOUS WASTE INSPECTION REPORT PRE-INSPECTION CHECKLIST

### Section A-- REQUIRED INFORMATION

1. Has the facility received an EPA ID number? [335.63 / 262.12] N/A YES ☒ NO
2. Has the facility received a TNRCC Registration Number? [335.6] N/A YES ☒ NO
3. If the answer to questions 1 and/or 2 above is "no", has the inspector submitted an IHW Change Form along with this report? N/A ☒ YES      NO
4. Inspection: Announced? If yes, date of contact: January 8, 2001 YES ☒ NO

### Section B-- GENERAL INFORMATION

1. Review Notice of Registration
2. Review facility file
3. Review shipment summaries (on TRACS)
4. Review RCRIS log:
  - a. Is facility's name correct? YES ☒ NO       
If no, note change on IHW Change Form.
  - b. What is RCRIS facility status? CESQG      SQG      LQG ☒ TS      LD      NON       
Is the status correct? YES ☒ NO       
If no, note change on CMEL and IHW Change Form.
  - c. Are outstanding violations for this facility listed in RCRIS? NO ☒ YES       
If yes, please explain briefly:

These need to be addressed during the inspection and noted on the CMEL.

**TNRCC INDUSTRIAL AND HAZARDOUS WASTE INSPECTION REPORT  
COMPLIANCE EVALUATION INSPECTION (CEI)  
FACILITY CHECKLIST**

**Section A— GENERAL SITE INFORMATION AND UNAUTHORIZED DISCHARGES**

1. Describe land use within one mile: Industrial, Residential, Commercial, Wetlands
2. Are any closed or abandoned solid waste units present? N/A NO ☒ YES
3. Has proof of deed recordation of all closed solid waste land disposal units been provided to the TNRCC? [335.5 / 335.8(b)(4)] N/A ☒ YES      NO
4. Attach plant map or sketch showing site orientation, waste management units, and major topographic features. See Attachment 2.
5. Is any evidence present of fires and explosions or other releases to the environment from solid waste units or other on-site sources? [335.4 / 26.121] N/A NO ☒ YES
6. If fires, explosions or other releases have threatened, or could have threatened, human health outside of the facility site, or if the generator had knowledge that a spill had reached surface waters, have these occurrences been reported?  
[general: 26.266 / 327.3; LQG:335.69(a)(4), ref. 335.113] N/A ☒ YES      NO
7. Have all releases of contaminants to the environment been documented and was appropriate action taken by the responsible party?  
[335.69(a)(4), ref. 335.112(a)(3) / 262.34(a)(4), ref. 265.56(c)] N/A ☒ YES      NO

**Section B— HAZARDOUS WASTE DETERMINATION AND NOTIFICATION**

1. Has the generator completed a hazardous waste determination for each solid waste generated?  
[335.62 / 262.11] YES ☒ NO       
Check the method(s) used for determination:  
a. Listed as a hazardous waste in 40 CFR Part 261, Subpart D? [335.504(1) / 262.11(b)] YES ☒ NO       
b. Process or materials knowledge? [335.504(2)(B) / 262.11(c)(2)] YES ☒ NO       
c. Tested for characteristics as identified in Part 261, Subpart C? [335.504(2)(A) / 262.11(c)(1)] YES ☒ NO
2. Has the generator documented waste classification determinations on all industrial (including non-hazardous) solid wastes? [335.503(a)(4) & 335.513] N/A YES ☒ NO       
Check the method(s) used for determination:  
a. Process or materials knowledge? [335.511] YES ☒ NO       
b. Tested for characteristics as identified in Part 261, Subpart C? [335.510] YES ☒ NO
3. For each hazardous waste generated, has the generator determined if it is restricted from land disposal? [335.431(c) / 268.7] N/A YES ☒ NO

\*\*\* An entry in this column indicates corrective action or comment is needed.

4. Did the generator provide written notification for all municipal hazardous waste streams, industrial solid waste streams and associated waste management units? [335.6(c)]

YES ☒ NO ☐

5. Did the generator immediately document any changes or additional information with respect to that originally provided and was written notification provided within 90 days? [335.6(c)]

N/A ☐ YES ☒ NO ☐

COMMENT: During the investigation, Aker reported that they had added "used antifreeze" to their NOR in October 2000. The information had been submitted electronically using the STEERS program. However, this new waste code had not been identified on the company registration. The problem has now been corrected and the new waste code was validated on February 6, 2001.

6. For generators of recyclable materials and non-hazardous recyclable materials subject to the notification requirements of 335.24 or Subchapter H, was notification of the recycling activity provided as required under 335.6(h)?

N/A ☐ YES ☒ NO ☐

### Section C- RECORDKEEPING AND REPORTING: MANIFEST SYSTEM

1. Does the generator use waste manifests when shipping Hazardous and Class 1 wastes off-site? [335.10(a) / 262.20(a)]

N/A ☐ YES ☒ NO ☐

2. Are waste manifests properly completed and signed?  
[completed as per 335.10(b) / 262.20(a) & signed as per 335.10(d)(1) / 262.23(a)]

N/A ☐ YES ☒ NO ☐

3. Identify primary off-site disposal/treatment/recycling facilities:

U.S. Filter Recovery Services, San Antonio, Texas; ENSCO, El Dorado, Arkansas; Covel Gardens Landfill, San Antonio, Texas; Commercial Metals Company, Corpus Christi, Texas; and Atascosita Recycling and Disposal, Humble, Texas.

4. Did the generator designate (on the manifest) a facility which is authorized to receive the waste described on the manifest? [335.10(a)(5) / 262.20(b)]

N/A ☐ YES ☒ NO ☐

5. For shipments of hazardous waste to a designated facility in an authorized state which has not yet obtained authorization to regulate that particular waste as hazardous, did the generator assure that the designated facility agrees to sign and return the manifest? [335.10(a)(6) / 262.23(e)]

N/A ☒ YES ☐ NO ☐

6. For hazardous and Class 1 wastes generated in Texas and consigned to a TSDF in another state, did the generator use the proper state's manifest? [335.10(a)(3) / 262.21]

N/A ☐ YES ☒ NO ☐

7. If the original (white) copy of the manifest was not received back from the TSDF within 45 days of the date of shipment, has the generator submitted to the TNRCC an exception report? [335.13(k) / 262.42]

N/A ☒ YES ☐ NO ☐

8. Does the facility retain manifests and exception reports for at least three years from the date the waste was accepted by the initial transporter (or longer as required by 335.13(l) & 262.40(d))? [335.13(i)&(k) / 262.40(a)&(b)]

N/A ☒ YES ☐ NO ☐

\*\*\* An entry in this column indicates corrective action or comment is needed.

**Section D— RECORDKEEPING AND REPORTING: WASTE ACTIVITIES**

1. Does the generator keep records of all hazardous waste and industrial solid waste activities in a format which is retrievable and easy to copy? [335.9(a)(1)] N/A YES ☒ NO
2. If the facility is a registered LQG:
- a. Does the facility owner/operator use STEERS for submittal of notifications and Annual Waste Summaries? [335.6(c) & 335.9(a)(2)] N/A YES ☒ NO
- b. If no, has the executive director granted use of paper forms or an alternative reporting method? [335.6(c) & 335.9(a)(2)] N/A ☒ YES NO
3. Does the generator submit complete and correct Annual Waste Summaries on or before January 25 of each year? (NB: After the 1997 reporting, electronic AWS reports are due on March 1 of the following year.) [335.9(a)(2)(A)-(C)] N/A YES ☒ NO
- COMMENT: The generator last submitted an Annual Waste Summary on November 20, 2000.
4. If the facility is an unregistered generator or an out-of-state primary exporter, have Waste Shipment Summaries (S1) and/or Foreign Waste Shipment Summaries (F1) been completed correctly and submitted on or before the 25th of each month for shipments originating during the previous month? [335.13(a)-(d)] N/A ☒ YES NO
5. Are records of any tests results, waste analyses or other determinations made in accordance with the hazardous waste determination requirements kept for at least three (3) years from the date that the waste was last sent to an on-site or off-site storage, processing or disposal facility? [335.70(a) / 262.40(c)] N/A YES ☒ NO
6. Are the following records and reports maintained at the facility for at least three years, if applicable:
- a. Waste Shipment Summaries (S1) and/or Foreign Waste Shipment Summaries (F1) for out-of-state or foreign shipments, or for shipments from outside the U.S. and transported through Texas to another state? [335.13(d)] N/A ☒ YES NO
- b. Annual waste summaries? [335.70(b)] N/A YES ☒ NO
7. Has the owner or operator submitted, when appropriate, the reports pertaining to releases, fires and explosions? [327.5(c) / 335.69(a)(4), ref. 335.113] N/A ☒ YES NO

\*\*\* An entry in this column indicates corrective action or comment is needed.

Section E- LDR DETERMINATIONS, TREATMENT, AND DISPOSAL**WASTE IDENTIFICATION AND TESTING**

1. Has the facility operator determined whether restricted wastes or treatment residues exceeded the appropriate treatment standards based on the following: [335.431 / 268.7(a)]
- a. Knowledge of the waste? N/A    YES    ☒ NO
- b. Waste determinations?
- i. Did the facility test the waste, an extract, or treatment residue to assure compliance with the applicable treatment standards and prohibitions? N/A    YES    ☒ NO
- ii. For California List Wastes (liquid nickel, thallium, HOC, >PCB hazardous wastes), did the generator determine the waste to be liquid or non-liquid using the Paint Filter Liquids Test? [335.431 / 268.32(i)] N/A    ☒ YES    NO
2. Did the facility determine the underlying constituents for wastes that exhibit the characteristics of ignitability, corrosivity, and organic toxicity? [335.431 / 268.7(a)] N/A    YES    ☒ NO

**TREATMENT AND DILUTION**

3. Does a facility that treats waste, follow a written waste analysis plan? [335.431 / 268.7(a)(4) & 268.7(b)] N/A    ☒ YES    NO
4. Did the facility treat the waste using the appropriate technology standard, total waste standard, or waste extract standard? [335.431 / 268.40] N/A    ☒ YES    NO
5. For generators who commingle wastes prior to on-site treatment or off-site disposal:
- a. Did the generator mix restricted wastes which have different treatment standards? N/A    NO    ☒ YES
- b. If yes, did the generator select the most stringent treatment standard for compliance with LDR requirements? [335.431/268.40(c)] N/A    ☒ YES    NO
6. Did the generator dilute a restricted waste or residue in a manner which is prohibited? [335.431 / 268.3(a)] N/A    NO    ☒ YES
7. For characteristically hazardous wastes specified for a method *other than* DEACT as the treatment standard in 268.40, and for D003 reactive cyanide wastewaters or nonwastewaters, was the specified treatment method performed prior to dilution of the waste for the purpose of pretreatment or disposal? [335.431 / 268.3(b)] N/A    ☒ YES    NO
8. For restricted wastes or residues that are hazardous for characteristics *only*, which are treated by mixture with other wastewater, and which are either discharged under the terms of an NPDES permit or disposed of into a nonhazardous Class I injection well, does the waste exhibit any prohibited characteristic of hazardous waste at the point of discharge or injection? [335.431 / 268.1(c)(3)(ii) & 268.3(a)] N/A    ☒ NO    YES

\*\*\* An entry in this column indicates corrective action or comment is needed.



## DISPOSAL

9. Prior to placement of waste in a land-based unit or prior to disposal:

- a. Did the waste meet all applicable treatment standards? [335.431 / 268.40]  
b. If the waste or treatment residue is a restricted waste with a delayed effective date, was it placed in a unit that meets all MTRs (unless it meets a specified listed exclusion)? [335.431 / 268.5(h)(2)]  
c. If the answer to either a. or b., above, is NO, is the activity authorized by some exemption, a variance from the LDR requirements, a case-by-case extension, or some other authorization?  
d. If yes, explain the authorized activity: N/A

N/A ☒ YES ☐ NON/A ☒ YES ☐ NON/A ☒ YES ☐ NO

## Section F—RECORDKEEPING AND REPORTING: LAND DISPOSAL RESTRICTIONS

1. Does generator maintain the following records and reports, if applicable, for five years for Land Disposal Restrictions (LDR) documentation: [335.431, pending adoption of new 268.7(a)(7)]

- a. LDR notices and certifications for restricted wastes sent to off-site TSDFs?  
b. LDR notices and certifications for wastes meeting treatment standards?  
c. Waste analyses used for LDR determinations?  
d. All supporting data for LDR determinations made using knowledge of waste?

N/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NO

2. Were restricted wastes shipped off-site to an authorized TSDF? [335.2(b) / 270.1(c)]

N/A ☐ YES ☒ NO

3. Did the generator or handler provide the following information along with each restricted waste shipment: [335.431, pending adoption of new 268.7(a)(1)]

- a. Generator's EPA Hazardous Waste Number?  
b. Waste constituents that the treater will monitor, if monitoring will not include all regulated constituents for wastes F001-F005, F039, D001, D002, D003 and D012-D043?  
c. Wastewater or nonwastewater classification, as defined in §268.2(d) and (f)?  
d. Sub-category of the waste, if applicable?  
e. Manifest number associated with the shipment of the waste?  
f. For hazardous debris, the contaminants subject to treatment and associated statement?  
g. Waste analysis data, where available?

N/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NO

4. For wastes meeting treatment standards, did the generator provide the following information along with each waste shipment: [335.431, pending adoption of new 268.7(a)(2)]

- a. EPA Hazardous Waste Number?  
b. Waste constituents that will be monitored, if not monitoring for all regulated constituents for wastes F001-F005, F039, D001, D002, and D012-D043?  
c. Wastewater or nonwastewater classification?  
d. Sub-category of the waste, if applicable?  
e. Manifest number associated with the shipment of the waste?  
f. Waste analysis data, if available?  
g. Certification?

N/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NON/A ☐ YES ☒ NO

5. For restricted wastes being shipped off-site that are subject to an LDR exemption, did the generator submit an appropriate notice to the receiving facility that the waste is not prohibited from land disposal? [335.431, pending adoption of new 268.7(a)(3)]

N/A ☒ YES ☐ NO ☐

6. If the generator has shipped lab packs off-site, has the appropriate certification accompanied shipments? [335.431 / 268.7(a)(8)]

N/A ☒ YES ☐ NO ☐**Section G— INTERNATIONAL SHIPMENTS**N/A ☒

Complete this section for all facilities which import hazardous waste from or export hazardous waste to another country.

1. If a generator exported hazardous wastes, was the appropriate 60-day notification made to the EPA? [335.76(b)(1) / 262.53]
2. Was the waste manifested and signed by the foreign consignee? [335.76(b)(5)(E) / 262.54(f)]
3. Was a copy of the EPA Acknowledgment of Consent attached to the manifest? [335.76(b)(3)&(5)(G) / 262.54(h)]
4. Was confirmation of waste transportation out of the country received by the generator? [262.57]
5. Does the primary exporter maintain the following records for three years:
  - a. A copy of each notification of intent to export? [262.57(a)(1)]
  - b. A copy of each EPA Acknowledgment of Consent? [262.57(a)(2)]
  - c. A copy of each confirmation of delivery of the hazardous waste from the consignee? [262.57(a)(3)]
  - d. A copy of each annual report required by 262.56? [262.57(a)(4)]
6. If a facility received hazardous waste from outside of the U.S., were the following changes made to the manifest:
  - a. In place of the name, address, and EPA ID number of the foreign generator, was the name, address, and EPA ID number of the importer used? [262.60(b)(1)]
  - b. In place of the signature on the certification statement by the foreign generator, did the U.S. importer or his agent sign the certification? [262.60(b)(2)]

N/A ☒ YES ☐ NO ☐N/A ☒ YES ☐ NO ☐N/A ☒ YES ☐ NO ☐N/A ☒ YES ☐ NO ☐N/A ☒ YES ☐ NO ☐N/A ☒ YES ☐ NO ☐N/A ☒ YES ☐ NO ☐N/A ☒ YES ☐ NO ☐N/A ☒ YES ☐ NO ☐N/A ☒ YES ☐ NO ☐**Section H— PREPAREDNESS AND PREVENTION**

1. Is the facility equipped with:
  - a. Internal communication or alarm system capable of providing immediate emergency instruction to facility personnel? [335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.32(a)]
  - b. A device such as a telephone or two-way radio to contact emergency response personnel? [335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.32(b)]
  - c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? [335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.32(c)]
  - d. Water at adequate volume and pressure to service fire control equipment? [335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.32(d)]

N/A ☐ YES ☒ NO ☐N/A ☐ YES ☒ NO ☐N/A ☐ YES ☒ NO ☐N/A ☐ YES ☒ NO ☐

COMMENT: In addition to the standard equipment maintained for fire emergencies, the site has one truck with the capacity of 4000 gallons that can transport water to the location of a fire, if needed.

\*\*\* An entry in this column indicates corrective action or comment is needed.

2. Is facility emergency alarm, communication and control equipment inspected and maintained to ensure proper operation in time of emergency?

[335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.33]

N/A YES ✓ NO    

COMMENT: Aker's Safety Department conducts inspections and maintenance of this equipment.

3. Do all personnel handling hazardous wastes have immediate access to the internal alarm system or emergency communication system (also applies to any employee occupying the facility alone)? [335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.34]

N/A YES ✓ NO    

4. Is aisle space maintained to allow unobstructed movement of personnel and emergency response equipment? [335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.35]

N/A YES ✓ NO    

5. Has owner or operator attempted to make the following arrangements with local authorities:

- a. To familiarize police, fire departments and emergency response teams with facility layout and operation? [335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.37(a)(1)]

N/A YES ✓ NO    

- b. Agreements to designate primary and support authority where more than one police and/or fire department may respond to an emergency?

[335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.37(a)(2)]

N/A YES ✓ NO    

COMMENT: The Naval Air Station Ingleside has been designated the primary responder in the event of fire, due to the base's close proximity to the Aker Gulf Marine Aransas Pass Yard, their equipment, and the personnel they can provide.

- c. Agreements with state emergency response teams, emergency response contractors and equipment suppliers? [335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.37(a)(3)]

N/A YES ✓ NO    

- d. Arrangements to familiarize local hospitals with the properties of hazardous wastes handled and the potential injuries or illnesses which could result?

[335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.37(a)(4)]

N/A YES ✓ NO    

6. Has owner or operator documented any refusal of state or local agency to enter into such arrangements? [335.69(a)(4), ref. 335.112(a)(2) / 262.34(a)(4), ref. 265.37(b)]

NO ✓ YES     N/A    

#### Section I-- CONTINGENCY PLAN AND EMERGENCY PROCEDURES

1. Does facility have an adequate Contingency Plan, consistent with the specified requirements:

- a. Does the Plan describe actions taken by personnel in response to emergency situations? [335.69(a)(4), ref. 335.112(a)(3) / 262.34(a)(4), ref. 265.52(a)]

N/A YES ✓ NO    

- b. Does the Plan describe arrangements with state and local emergency response agencies? [335.69(a)(4), ref. 335.112(a)(3) / 262.34(a)(4), ref. 265.52(c)]

N/A YES ✓ NO    

- c. Does the Plan list names, addresses and phone numbers of personnel qualified as emergency coordinator in priority order?

[335.69(a)(4), ref. 335.112(a)(3) / 262.34(a)(4), ref. 265.52(d)]

N/A YES ✓ NO    

\*\*\* An entry in this column indicates corrective action or comment is needed.

- d. Does the Plan include a list of all emergency equipment on site and the location and description of equipment?

[335.69(a)(4), ref. 335.112(a)(3) / 262.34(a)(4), ref. 265.52(e)]

N/A YES ☒ NO

- e. Does the Plan include an adequate evacuation plan for facility personnel?

[335.69(a)(4), ref. 335.112(a)(3) / 262.34(a)(4), ref. 265.52(f)]

N/A YES ☒ NO

- f. Is the Plan maintained at the facility?

[335.69(a)(4), ref. 335.112(a)(3) / 262.34(a)(4), ref. 265.53(a)]

N/A YES ☒ NO

- g. Has the Plan been submitted to all state and local agencies providing emergency response service?

[335.69(a)(4), ref. 335.112(a)(3) / 262.34(a)(4), ref. 265.53(b)]

N/A YES ☒ NO

- h. Is the emergency coordinator on site or on call at all times?

[335.69(a)(4), ref. 335.112(a)(3) / 262.34(a)(4), ref. 265.55]

N/A YES ☒ NO

COMMENT: Aker's Contingency Plan and Emergency Procedures were last updated October 11, 2000 and at the time of this investigation were under review by a professional engineer.

#### Section J-- PERSONNEL TRAINING

1. Have facility personnel successfully completed a training program of ( ☒ ) classroom instruction or ( ☒ ) on-the-job training consistent with the requirements of 40 CFR 264.16 or 40 CFR 265.1, including (check one or both above): [335.69(a)(4), ref. 335.112(a)(1) / 262.34(a)(4), ref. 265.16(a)(1)]

- a. Is the program directed by a person trained in hazardous waste management procedures? [335.69(a)(4), ref. 335.112(a)(1) / 262.34(a)(4), ref. 265.16(a)(2)]

N/A YES ☒ NO

- b. Is the program designed to ensure effective emergency response?

[335.69(a)(4), ref. 335.112(a)(1) / 262.34(a)(4), ref. 265.16(a)(3)]

N/A YES ☒ NO

- c. Is the program completed within six months of date of employment?

[335.69(a)(4), ref. 335.112(a)(1) / 262.34(a)(4), ref. 265.16(b)]

N/A YES ☒ NO

- d. Is an annual review of training given to personnel?

[335.69(a)(4), ref. 335.112(a)(1) / 262.34(a)(4), ref. 265.16(c)]

N/A YES ☒ NO

COMMENT: All new employees are required to attend Safety and Environmental training. Anyone who may come in contact with hazardous materials is required an additional two hour course. All training requirements are conducted by Aker's Human Resources Department.

2. Does the owner or operator keep the following records at the facility:

- a. Name, job title, and job description of each employee in a position related to hazardous waste management?

[335.69(a)(4), ref. 335.112(a)(1) / 262.34(a)(4), ref. 265.16(d)(1)&(2)]

N/A YES ☒ NO

- b. Written description of type and amount of training?

[335.69(a)(4), ref. 335.112(a)(1) / 262.34(a)(4), ref. 265.16(d)(3)]

N/A YES ☒ NO

- c. Documentation and record of training given each employee?

[335.69(a)(4), ref. 335.112(a)(1) / 262.34(a)(4), ref. 265.16(d)(4)]

N/A YES ☒ NO

\*\*\* An entry in this column indicates corrective action or comment is needed.



**TNRCC INDUSTRIAL AND HAZARDOUS WASTE INSPECTION REPORT  
COMPLIANCE EVALUATION INSPECTION (CEI)  
CONTAINER STORAGE AREA (CSA) CHECKLIST**

Complete this Checklist for all CSAs where hazardous waste is managed.

NOR Unit No.(s) 001, 002, 003, 004Section A— ACCUMULATION TIME EXEMPTION (ATE)

1. Is the beginning date of accumulation clearly indicated on each container?

[335.69(a)(2) / 262.34(a)(2)]

N/A YES NO ✓

COMMENT: During this investigation, it was noted that the beginning date of accumulation was not indicated on one container of paint waste. A hazardous waste label, however, was present. A verbal notice of violation was issued and documentation was requested within 14 days for the regulated entity to identify a beginning date of accumulation and to mark the container accordingly. Aker has begun management of paint wastes according to the Universal Waste Rules for paint and paint related wastes. This information was received in the Region 14 office on February 2, 2001. Reference Attachment 5.

2. Is each container clearly labeled or marked "Hazardous Waste"?

[335.69(a)(3) / 262.34(a)(3)]

N/A YES ✓ NO

3. Did generator exceed the accumulation time limitation?

[335.69(a) / 262.34(a)]

N/A NO ✓ YESSection B— CONTAINER STORAGE AREAS (CSAs)

1. Are containers in good condition?

[335.69(a)(1)(A), ref. 335.112(a)(8) / 262.34(a)(1)(i), ref. 265.171]

N/A YES ✓ NO

2. Are the containers compatible with the wastes being stored?

[335.69(a)(1)(A), ref. 335.112(a)(8) / 262.34(a)(1)(i), ref. 265.172]

N/A YES ✓ NO

3. Are containers kept closed except when adding waste?

[335.69(a)(1)(A), ref. 335.112(a)(8) / 262.34(a)(1)(i), ref. 265.173(a)]

N/A YES ✓ NO

4. Are containers stored in a safe manner?

[335.69(a)(1)(A), ref. 335.112(a)(8) / 262.34(a)(1)(i), ref. 265.173(b)]

N/A YES ✓ NO

5. Are containers inspected weekly for leakage and deterioration?

[335.69(a)(1)(A), ref. 335.112(a)(8) / 262.34(a)(1)(i), ref. 265.174]

N/A YES NO ✓

COMMENT: At the time of this investigation, inspection records for the period of January through December 2000 were reviewed. The records for September through mid-August 2000, however, were not contained in the files. Copies of these documents were requested and were received in Region 14 on February 1, 2001. Reference Attachment 4.

\*\*\* An entry in this column indicates corrective action or comment is needed.

6. Are containers holding ignitable or reactive wastes kept at least 15 meters (50 ft) from the facility property line?

[335.69(a)(1)(A), ref. 335.112(a)(8) / 262.34(a)(1)(i), ref. 265.176]

N/A YES ☒ NO

7. Are containers holding incompatible wastes separated by a physical barrier or sufficient distance? [335.69(a)(1)(A), ref. 335.112(a)(8) / 262.34(a)(1)(i), ref. 265.177(c)]

N/A ☒ YES NO

COMMENT: The company NOR identifies four container storage areas. Unit number 001 is the temporary drum storage area; unit number 002 is a 250 gallon used oil tank; unit number 003 is a distillation/solvent recovery unit; and unit number 004 is a distillation/solvent recovery unit that has been taken out of service indefinitely.

### Section C- SATELLITE ACCUMULATION AREAS (SAAs)

1. Are containers in good condition? [335.69(d)(1) / 262.34(c)(1)(i), ref. 265.171]

N/A YES ☒ NO

2. Is the waste compatible with the containers? [335.69(d)(1) / 262.34(c)(1)(i), ref. 265.172]

N/A YES ☒ NO

3. Are containers kept closed except when adding or removing waste?

[335.69(d)(1) / 262.34(c)(1)(i), ref. 265.173(a)]

N/A YES ☒ NO

4. Are containers marked "hazardous waste" or labeled to identify the contents?

[335.69(d)(2) / 262.34(c)(1)(ii)]

N/A YES ☒ NO

5. If waste accumulation has exceeded 55 gallons of hazardous waste or 1 quart of acutely hazardous waste:

a. Has container holding excess amount been marked with beginning date of excess accumulation? [335.69(e) / 262.34(c)(2)]

N/A ☒ YES NO

b. Have excess amounts remained in the SAA over 3 days? [335.69(e) / 262.34(c)(2)]

N/A ☒ NO YES

6. Does the facility maintain a record of the location of each SAA? [335.9(a)(1)(G)]

N/A YES NO ☒

COMMENT: This document was not available at the time of this investigation and a verbal notice of violation was issued. The location of satellite accumulation areas was provided February 1, 2001.

7. Include locations of SAAs as Attachment 3.

\*\*\* An entry in this column indicates corrective action or comment is needed.





# **TNRCC FIELD OPERATIONS CHECKLIST** **SOURCE REDUCTION & WASTE MINIMIZATION PLAN (7/29/97)**

TNRCC Region	14	Date	January 22, 2001
Facility Name/Address	Aker Gulf Marine Aransas Pass Yard FM 2725 Ingleside, Texas 78362	IDs: EPA	TXD121488902
		Solid Waste	37946

Suzanne Parr  
TNRCC Representative  
Date of Plan N/A

Mr. Steven Hubbard  
Company Representative

1. Does the facility generate more than 1.102 tons of hazardous waste annually? [335.475] YES ☒ NO ☐

The company becomes exempt from these requirements by managing paint and paint related wastes according to the Universal Waste Rules, which state that large-quantity handlers of universal wastes may accumulate more than 5000 kilograms total (calculated collectively) of universal waste at any time. The universal waste may also be accumulated for up to one year, and the wastes do not count toward the total hazardous waste generator status.

2. Is the facility required to report annually on the Toxics Release Inventory Form R? [335.475] YES ☐ NO ☒

If the answer to 1 or 2 is YES, the facility is required to have a plan under Subchapter Q; complete the rest of the form.

3. Does the facility have a source reduction and waste minimization plan? [335.474 & 335.479] N/A ☒ YES ☐ NO ☐

4. Does the plan contain:
- a. Information on environmental and human health risks considered in determining reduction goals? [335.474(1)(C)&(3)(F)] N/A ☒ YES ☐ NO ☐
  - b. A prioritized list of pollutants and contaminants to be reduced? [335.474(1)(J)(iv)&(3)(D)] N/A ☒ YES ☐ NO ☐

5. If the facility does not have a plan and is required to so, complete the following:

Verbal notification	YES	NO	NA	X
NOV issued	YES	NO	NA	X

REMARKS/COMMENTS

\*\*\* An entry in this column indicates corrective action or comment is needed.

Aker Gulf Marine - Aransas Pass Yard  
TNRCC ID No. 37946  
EPA ID No. TXD121488902  
Compliance Evaluation Investigation Conducted January 11 and 22, 2001

Attachment 1

Notice of Registration

\*\*\* TEXAS NATURAL RESOURCE CONSERVATION COMMISSION \*\*\*  
Notice of Registration  
Industrial and Hazardous Waste

Page: 1  
Date: 01/31/01

37946 Aker Gulf Marine

Solid Waste Registration Number: 37946 EPA ID: TXD121488992

Company Name: Aker Gulf Marine  
Site Name: Aransas Pass Yard  
Site Location: FM 2725, 2 miles north of FM 1069, Aransas Pass, TX  
Contact: Hubbard, Steven

Region: 14 Initial Registration Date: 04/24/1987  
County: 205 San Patricio Last Amendment Date: 01/27/2001  
Last Date NOR Computer update: 01/30/2001  
Title: Environmental Coordinator Phone: 512-776-8161

Mailing Address: P.O. Box C

Inglewade, TX 78362-1302

Site Street Address: FM 2725  
2 miles north of FM 1069  
Aransas Pass, TX 78336

Registration Status: Active  
Registration Type: Generator  
Generator Type: Industrial

Reporting Method: STEERS

Hazardous Waste Generation Status: Large Quantity Generator

Primary SIC Code: 3441 Fabricated Structural Metal  
Handler Status:

Operator Information  
Name:  
Phone:  
Address:

Owner Information  
Name:  
Phone:  
Address:

As of 01/27/2001 - the next unassigned sequence number for WASTES is 0519 and  
the next unassigned sequence number for UNITS is 005.

Notice of Registration  
Industrial and Hazardous Waste

Date: 01/31/01

37946 Aker Gulf Marine

## \*\*\*\* WASTE INFORMATION \*\*\*\*

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete
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## \*\*\*\*\* Active Wastes \*\*\*\*\*

0501203H H	Active	01/12/94	Off	No	No	
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Description from Generator: Spent solvent, parts cleaning

Refers to waste code (6): 910100

Form Code: 203 Non-halogenated solvent

EPA Hazardous Waste Numbers: D001 D010 D039

Current Management Units: None

\* Origin Codes: 1 Onsite-process/service

\* Source Codes: A19 Other cleaning and degreasing

\* Measurement Points: 1 Before mixing

\* SIC Codes: 3533 Oil Field Machinery &amp; Equipment

0503209H H	Active	01/12/94	Off	No	No	
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Description from Generator: Solid paint waste/painting

Refers to waste code (6): 910650

Form Code: 209 Organic paint, ink, lacquer, or varnish

EPA Hazardous Waste Numbers: D001 F005

Current Management Units: None

\* Origin Codes: 1 Onsite-process/service

\* Source Codes: A21 Painting

\* Measurement Points: 1 Before mixing

\* SIC Codes: 3441 Fabricated Structural Metal

05042061 1	Active	01/12/94	Off		No	
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Description from Generator: Waste oil/ oil changes

Form Code: 206 Waste oil

Current Management Units: None

\* Origin Codes: 1 Onsite-process/service

05053101 1	Active	01/12/94	Off		No	
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Description from Generator: Absorbents/ Oil spills

Form Code: 310 Spent solid filters or adsorbents (inorganic)

Current Management Units: None

\* Origin Codes: 1 Onsite-process/service 2 Spill clean-up

05066961 1	Active	01/12/94	Off		No	
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Description from Generator: Skip grease/ greasing skidway.

Form Code: 696 Grease

Current Management Units: None

\* Origin Codes: 1 Onsite-process/service

05073081 1	Active	01/12/94	Off		No	
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Description from Generator: Crushed metal drums or containers/ Painting of old drums and containers.

Form Code: 108 Empty or crushed metal drums or containers

Current Management Units: None

\* Origin Codes: 1 Onsite-process/service

\*\*\* TEXAS NATURAL RESOURCE CONSERVATION COMMISSION \*\*\*  
 Notice of Registration  
 Industrial and Hazardous Waste

Page: 3  
 Date: 01/31/01

37946 Aker Gulf Marine

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/Offsite	Radio-active	THRC Audit Complete
05093011	1	Active	01/12/94	Off	No	

\*\*\*\*\* Active Wastes \*\*\*\*\*

Description from Generator: Soil contaminated with oil/oil spills.  
 Form Code: 301 Soil contaminated with organics  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

05103071 1 Active 06/06/95 Off No  
 Description from Generator: Mill slag / Plate rolling  
 Form Code: 307 Metal scale, filings, or scrap  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

05113091 1 Active 08/01/95 Off No  
 Description from Generator: Used batteries from equipment and cars  
 Form Code: 309 Batteries or battery parts, casings, cores  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

05123071 1 Active 08/01/95 Off No  
 Description from Generator: Scrap metal/Scrap after construction is complete  
 Form Code: 307 Metal scale, filings, or scrap  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

05133091 1 Active 08/01/95 Off No  
 Description from Generator: Blasting grit/Blasting metal structures  
 Form Code: 309 Nonhazardous sandblasting waste (inorganic solid)  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service

05149992 2 Active 11/27/95 Off No No  
 Description from Generator: PLANT TRASH  
 Form Code: 999 Plant Refuse  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 Company's Internal Code(s): 37946

05152051 1 Active 05/07/96 Off No No  
 Description from Generator: Electrical Generators that run Machine Shops are equipt with moisture tanks (oily water)  
 Form Code: 205 Oil-water emulsion or mixture  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 Company's Internal Code(s): TXD121488902

05163101 1 Active 05/15/96 Off No No  
 Description from Generator: used oil filters from oil changes on equipment, cars, and trucks  
 Form Code: 310 Spent solid filters or adsorbents (inorganic)  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 Company's Internal Code(s): 37946



\*\*\* TEXAS NATURAL RESOURCE CONSERVATION COMMISSION \*\*\*  
 Notice of Registration  
 Industrial and Hazardous Waste

Page: 4  
 Date: 01/31/01

37946 Aker Gulf Marine

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/Offsite	Radio-active	TNRCC Audit Complete
05174031	1	Active	05/15/96	Off	No	No

\*\*\*\*\* Active Wastes \*\*\*\*\*

Description from Generator: waste from fireproofing structural steel  
 Form Code: 403 Solid resins or polymerized organics  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 Company's Internal Code(s): 37946

05183031 1 Active 10/02/97 Off No No  
 Description from Generator: Ash residue from incinerator  
 Form Code: 303 Ash, slag or other res-(inorgan.) incin. of waste  
 Current Management Units: None  
 \* Origin Codes: 1 Onsite-process/service  
 Company's Internal Code(s): 37946

910100 H Active On/Off No  
 Description from Generator: SOLVENTS, SPENT  
 Form Code:  
 EPA Hazardous Waste Numbers: D001 D002 F003 F005  
 Current Management Units: Contain Store Area 001  
 \* Origin Codes:

910650 H Active On/Off No  
 Description from Generator: PAINT WASTE, LIQUID  
 Form Code:  
 EPA Hazardous Waste Numbers: D001 F005  
 Current Management Units: Contain Store Area 001  
 \* Origin Codes:

\* The first value is considered the primary value (e.g. primary origin code).  
 As of 01/27/2001, the next unassigned sequence number for WASTES is 0519.

\*\* No Longer Generated Wastes \*\*

02211H H Inactive 10/30/00 NA No No  
 Description from Generator: Spent solvents/ painting and clean-up  
 Refers to waste code (5): 910100  
 Form Code: 211 Paint thinner or petroleum distillates  
 EPA Hazardous Waste Numbers: D001 D002 F003 F005  
 Current Management Units: Distill/Solv Recovery 003 004  
 \* Origin Codes: 1 Onsite-process/service  
 \* Source Codes: A21 Painting  
 \* Measurement Points: 1 Before mixing  
 \* SIC Codes: 3441 Fabricated Structural Metal

As of 01/27/2001, the next unassigned sequence number for WASTES is 0519.

\*\*\* TEXAS NATURAL RESOURCE CONSERVATION COMMISSION \*\*\*  
 Notice of Registration  
 Industrial and Hazardous Waste

Page: 5  
 Date: 01/31/01

37946 Aker Gulf Marine

## \*\*\*\* UNITS AT THIS SITE MANAGING WASTE \*\*\*\*

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # Permit	Regulatory Status	Dead Recording Needed/Date
-------------	-----------	-------------	----------------	---	--------------------	---------------	-------------------	----------------------------

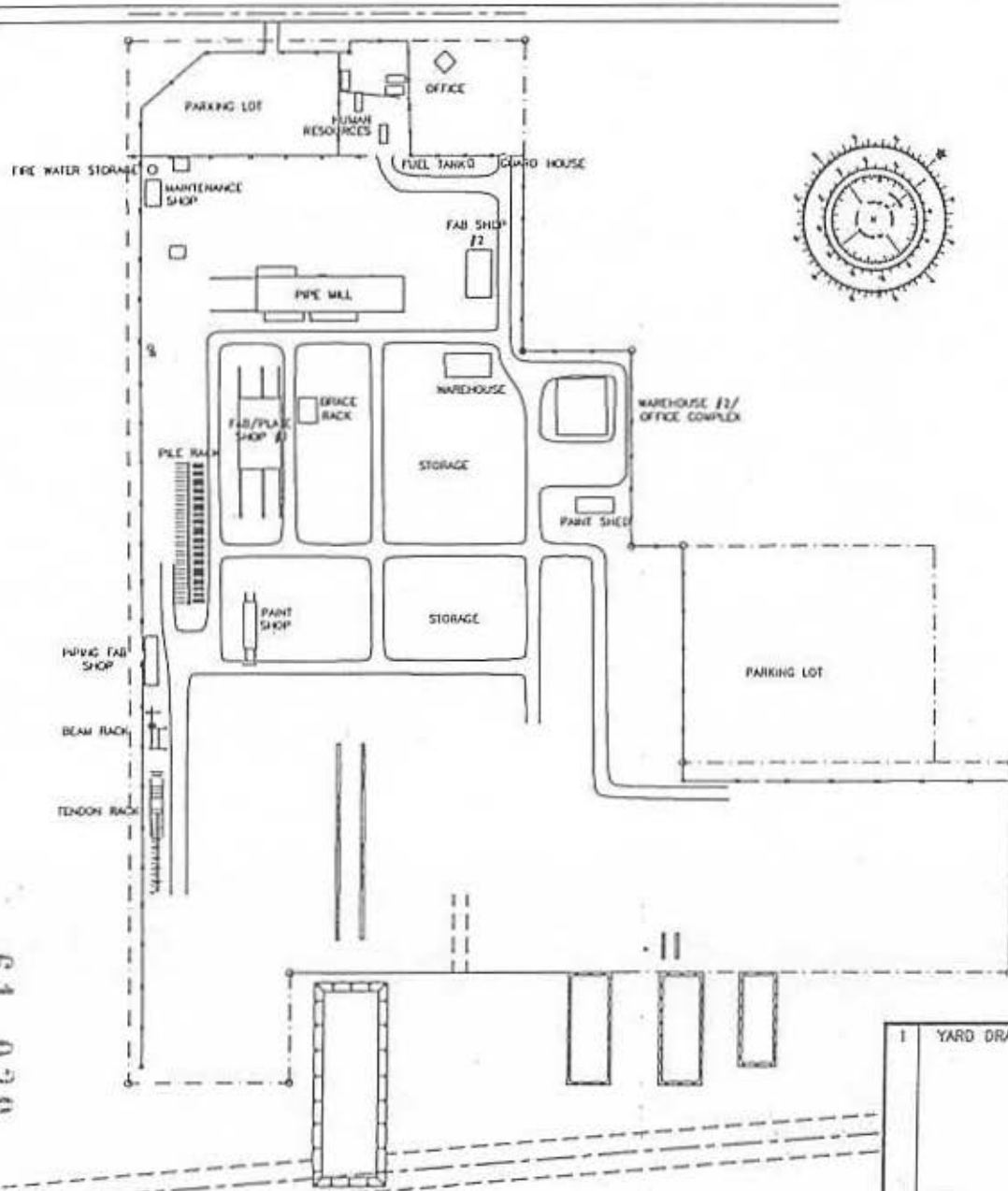
## \*\* 'Active' &amp; 'Closure Pending' Units \*\*

001	Contain Store Area	Active		H/ NA	NA	NA		NA /
Description from Company: TEMPORARY STORAGE (ACCUMULATION ONLY)								
System Types:								
Wastes Currently Managed in Unit: 910100 SOLVENTS, 910650 PAINT WAST								
002	Tank (Surface)	Active		/ NA	NA	NA		NA /
Description from Company: Cap: 250 GAL.								
System Types:								
Wastes Currently Managed in Unit:								
003	Distill/Solv Recovery	Active	09/01/95	H/ NA	NA	NA		NA /
Description from Company: Solvent reclaim. Behind retoblast.								
Capacity: 55.0000 Capacity Unit of Measure: G								
System Types: 022 Thin film evaporation 024 Other solvent recovery								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit: 0502211H Spent solv								
004	Distill/Solv Recovery	Active	09/01/95	H/ NA	NA	NA		NA /
Description from Company: Solvent reclaim. Behind retoblast								
System Types: 022 Thin film evaporation 024 Other solvent recovery								
Biennial System Regulatory Status: Regulatory status unknown								
Wastes Currently Managed in Unit: 0502211H Spent solv								

As of 01/27/2001, the next unassigned sequence number for UNITS is 005.

Aker Gulf Marine - Aransas Pass Yard  
TNRCC ID No. 37946  
EPA ID No. TXD121488902  
Compliance Evaluation Investigation Conducted January 11 and 22, 2001

Attachment 2  
Facility Site Diagram



DESCRIPTION	
TOTAL AREA	(647,520 SQ.M.) 160 ACRES
COVERED FAB. AREAS	(8,362 SQ.M.) 90,000 SQUARE FEET
PAINT SHEDS	(464.5 SQ.M.) 5,000 SQUARE FEET
WAREHOUSES & OFFICES	(7432 SQ.M.) 80,000 SQUARE FEET
MAINTENANCE	(603.85 SQ.M.) 6,500 SQUARE FEET
STORAGE AREA	(202,350 SQ.M.) APPROX. 50 ACRES
FABRICATION AREA	(323,760 SQ.M.) APPROX. 80 ACRES

SHOP FACILITIES	
PIPE ROLLING MILL	
PIPE FABRICATION SHOP	PILE FABRICATION RACK
PLATE FABRICATION SHOP	PRESS BRACE SHOP
COMPUTERIZED BRACE COPING SHOP	MAINTENANCE SHOP
	BRACE RACK

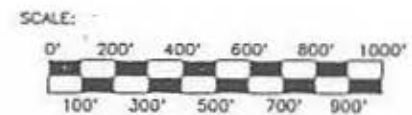
LOADOUT CAPABILITIES	
SHEET-PILE BULKHEAD	(304.8 M.) 1,000 FT. LENGTH
WATER DEPTH AT FACE OF DOCK	(4.8768 M.) 16 FT.
DECKS OR MODULES UP TO 5,000 TONS	
SEA ACCESS	CORPUS CHRISTI SHIP CHANNEL
	(13.716 M.) 45 FT. DEPTH
	SOUTHERN PACIFIC
	FM 2725

RAIL ACCESS	
ROAD ACCESS	


SHOP LIFTING EQUIPMENT	
PIPE MILL	
30-TON OVERHEAD CRANE	
2-20 TON OVERHEAD CRANES	
20-TON SEMI-GANTRY CRANE	

FABRICATION SHOP	
2-15-TON OVERHEAD CRANES	
2-10-TON OVERHEAD CRANE	

YARD LIFTING EQUIPMENT	
1 - 800 TON CRAWLER CRANE	
2 - 600 TON CRAWLER CRANES	
4 - 500 TON CRAWLER CRANES	
4 - 350 TON CRAWLER CRANES	
NUMEROUS SMALLER CRAWLER CRANES, HYDRAULIC CRANES, AND LARGE FORKLIFTS.	



61 029

1	YARD DRAWING REVISED	WW	12-92	DATE: 3-16-93	 <b>AKER GULF MARINE</b>  <b>ARANSAS PASS YARD</b>  <b>GENERAL YARD LAYOUT</b>
				SCALE: SHOWN	
				CAD FILE: MIS\YARD\ACMAP92	
				DRAWN BY: W.O.W.	
				JOB #:	
				OWG. #:	1
NO.	REVISION	BY	APP'D	DATE	APPROVED BY:

Aker Gulf Marine - Aransas Pass Yard  
TNRCC ID No. 37946  
EPA ID No. TXD121488902  
Compliance Evaluation Investigation Conducted January 11 and 22, 2001

Attachment 3  
Correspondence From the Facility

Photographic Documentation  
Demonstrating Corrected Labeling of Drums



Photograph of drum that previously had no beginning date of accumulation visible. Tracking data showing the start date, 11/27/2000, has also been submitted with this photo. The drum is now being managed as a "Universal Waste."





Photograph of drum that previously had no beginning date of accumulation visible. Tracking data showing the start date, 11/27/2000, has also been submitted with this photo. The drum is now being managed as a "Universal Waste."

EXTRA COPY

FOR R-14'S

REPORT.



## DRUM TRACKING LOG



Job No.: 3291				
Date: 11-27-00				
Time: 10:35 AM				
Leadman: A. Butierrez				
Badge No.: 2645.0				
Operator:				
Badge No.:				
Drum No.: 200232				
Contents: Paint Waste	Contaminated Soil	Skid Grease	Anti-Freeze	Aerosol Cans
	Mill Slag	Paint Waste	Oily Water	Other
	Oily Rags	Oil Filters	Waste Oil	
Delivered to: A.P.W.A.	Arkansas Pass Waste Area		Ingleside Waste Area	
Drum properly labeled	Yes	No		
All bungs and lids on and tight	Yes	No		
Any leaks	Yes	No		
Comments:				

Aker Gulf Marine - Aransas Pass Yard  
TNRCC ID No. 37946  
EPA ID No. TXD121488902  
Compliance Evaluation Investigation Conducted January 11 and 22, 2001

Attachment 4  
Correspondence From the Facility

Weekly Container Storage Area Inspection Reports  
(08/03/2000 - 09/16/2000)



## POLLUTION PREVENTION INSPECTION REPORT

(Hazardous Waste Accumulation Area / Bulk Tank Storage Areas)

Site or Job Location: ARANSAS PASS YARD

- |  |                                      |                                     |
|--|--------------------------------------|-------------------------------------|
| 1. Any evidence of leaking containers?   | Yes                                  | <input checked="" type="radio"/> No |
| 2. Any evidence of deterioration of containers caused by corrosion or other factors? | Yes                                  | <input checked="" type="radio"/> No |
| 3. All containers properly labeled?  | <input checked="" type="radio"/> Yes | No                                  |
| 4. Labels clearly visible?   | <input checked="" type="radio"/> Yes | No                                  |
| 5. Aisle space open and clear of obstruction?  | <input checked="" type="radio"/> Yes | No                                  |
| 6. All bungs and lids on and tight?<br>(except for adding to or filling operations)  | <input checked="" type="radio"/> Yes | No                                  |
| 7. "No Smoking" and "Hazardous Waste Accumulations Area" signs in place?             | <input checked="" type="radio"/> Yes | No                                  |
| 8. Spill control equipment in place?   | <input checked="" type="radio"/> Yes | No                                  |
| 9. Storage dates under the 90 day limit?   | <input checked="" type="radio"/> Yes | No                                  |
| 10. Incompatible waste separated properly?   | <input checked="" type="radio"/> Yes | No                                  |
| 11. Grass and or weeds mowed?  | <input checked="" type="radio"/> Yes | No                                  |

12. Condition of containment facility:

OK

12. Condition of bulk storage tanks:

OK

Date 8/3/00 Time 3:00

Signature

[Signature]

### Distribution:

D. Goodwin L. Guillot

L. Rivere

J. Whitley

H. Murphy

File

ENVIRONMENTAL HAZARD INSPECTION REPORT



## POLLUTION PREVENTION INSPECTION REPORT

(Hazardous Waste Accumulation Area / Bulk Tank Storage Areas)

Site or Job Location: ARKANSAS PASS YARD

- |     |   |            |           |
|-----|---|------------|-----------|
| 1.  | Any evidence of leaking containers?   | Yes        | <u>No</u> |
| 2.  | Any evidence of deterioration of containers caused by corrosion or other factors? | Yes        | <u>No</u> |
| 3.  | All containers properly labeled?  | <u>Yes</u> | No        |
| 4.  | Labels clearly visible?   | <u>Yes</u> | No        |
| 5.  | Aisle space open and clear of obstruction?  | <u>Yes</u> | No        |
| 6.  | All bungs and lids on and tight?<br>(except for adding to or filling operations)  | <u>Yes</u> | No        |
| 7.  | "No Smoking" and "Hazardous Waste Accumulations Area" signs in place?             | <u>Yes</u> | No        |
| 8.  | Spill control equipment in place?   | <u>Yes</u> | No        |
| 9.  | Storage dates under the 90 day limit?   | <u>Yes</u> | No        |
| 10. | Incompatible waste separated properly?  | <u>Yes</u> | No        |
| 11. | Grass and or weeds mowed?   | <u>Yes</u> | No        |

12. Condition of containment facility:

OK

12. Condition of bulk storage tanks:

OK

Date 8/11/00 Time 1:00 Signature [Signature]

Distribution:

D. Goodwin L. Guillot L. Rivere J. Whitley H. Murphy File

ENVIRONMENTAL HAZARD INSPECTION REPORT

61 036



## POLLUTION PREVENTION INSPECTION REPORT

(Hazardous Waste Accumulation Area / Bulk Tank Storage Areas)

Site or Job Location : ARANSAS PASS YARD

- |     |   |                                      |                                     |
|-----|---|--------------------------------------|-------------------------------------|
| 1.  | Any evidence of leaking containers?   | Yes                                  | <input checked="" type="radio"/> No |
| 2.  | Any evidence of deterioration of containers caused by corrosion or other factors? | Yes                                  | <input checked="" type="radio"/> No |
| 3.  | All containers properly labeled?  | <input checked="" type="radio"/> Yes | No                                  |
| 4.  | Labels clearly visible?   | <input checked="" type="radio"/> Yes | No                                  |
| 5.  | Aisle space open and clear of obstruction?  | <input checked="" type="radio"/> Yes | No                                  |
| 6.  | All bungs and lids on and tight?<br>(except for adding to or filling operations)  | <input checked="" type="radio"/> Yes | No                                  |
| 7.  | "No Smoking" and "Hazardous Waste Accumulations Area" signs in place?             | <input checked="" type="radio"/> Yes | No                                  |
| 8.  | Spill control equipment in place?   | <input checked="" type="radio"/> Yes | No                                  |
| 9.  | Storage dates under the 90 day limit?   | <input checked="" type="radio"/> Yes | No                                  |
| 10. | Incompatible waste separated properly?  | <input checked="" type="radio"/> Yes | No                                  |
| 11. | Grass and or weeds mowed?   | <input checked="" type="radio"/> Yes | No                                  |

12. Condition of containment facility:

OK

12. Condition of bulk storage tanks:

OK

Date 8/16/00 Time 8:00 Signature [Signature]

**Distribution:**

D. Goodwin L. Guillot L. Rivere J. Whitley H. Murphy File

ENVIRONMENTAL HAZARD INSPECTION REPORT





## POLLUTION PREVENTION INSPECTION REPORT

(Hazardous Waste Accumulation Area / Bulk Tank Storage Areas)

Site or Job Location : ARANSAS PASS YARD

- |     |   |                                      |                                     |
|-----|---|--------------------------------------|-------------------------------------|
| 1.  | Any evidence of leaking containers?   | Yes                                  | <input checked="" type="radio"/> No |
| 2.  | Any evidence of deterioration of containers caused by corrosion or other factors? | Yes                                  | <input checked="" type="radio"/> No |
| 3.  | All containers properly labeled?  | <input checked="" type="radio"/> Yes | No                                  |
| 4.  | Labels clearly visible?   | <input checked="" type="radio"/> Yes | No                                  |
| 5.  | Aisle space open and clear of obstruction?  | <input checked="" type="radio"/> Yes | No                                  |
| 6.  | All bungs and lids on and tight?<br>(except for adding to or filling operations)  | <input checked="" type="radio"/> Yes | No                                  |
| 7.  | "No Smoking" and "Hazardous Waste Accumulations Area" signs in place?             | <input checked="" type="radio"/> Yes | No                                  |
| 8.  | Spill control equipment in place?   | <input checked="" type="radio"/> Yes | No                                  |
| 9.  | Storage dates under the 90 day limit?   | <input checked="" type="radio"/> Yes | No                                  |
| 10. | Incompatible waste separated properly?  | <input checked="" type="radio"/> Yes | No                                  |
| 11. | Grass and or weeds mowed?   | <input checked="" type="radio"/> Yes | No                                  |

12. Condition of containment facility:

OK

12. Condition of bulk storage tanks:

OK

Date 8/23/00 Time 10:30

Signature

[Signature]

Distribution:

D. Goodwin L. Guillot

L. Rivere

J. Whitley

H. Murphy

File

GOENVIRONWASTEHAZINSPECTN.RPT



## POLLUTION PREVENTION INSPECTION REPORT

(Hazardous Waste Accumulation Area / Bulk Tank Storage Areas)

Site or Job Location: ARKANSAS PASS YARD

- |  |                                      |                                     |
|--|--------------------------------------|-------------------------------------|
| 1. Any evidence of leaking containers?   | Yes                                  | <input checked="" type="radio"/> No |
| 2. Any evidence of deterioration of containers caused by corrosion or other factors? | Yes                                  | <input checked="" type="radio"/> No |
| 3. All containers properly labeled?  | <input checked="" type="radio"/> Yes | No                                  |
| 4. Labels clearly visible?   | <input checked="" type="radio"/> Yes | No                                  |
| 5. Aisle space open and clear of obstruction?  | <input checked="" type="radio"/> Yes | No                                  |
| 6. All bungs and lids on and tight?<br>(except for adding to or filling operations)  | <input checked="" type="radio"/> Yes | No                                  |
| 7. "No Smoking" and "Hazardous Waste Accumulations Area" signs in place?             | <input checked="" type="radio"/> Yes | No                                  |
| 8. Spill control equipment in place?   | <input checked="" type="radio"/> Yes | No                                  |
| 9. Storage dates under the 90 day limit?   | <input checked="" type="radio"/> Yes | No                                  |
| 10. Incompatible waste separated properly?   | <input checked="" type="radio"/> Yes | No                                  |
| 11. Grass and or weeds mowed?  | <input checked="" type="radio"/> Yes | No                                  |

12. Condition of containment facility:

OK

12. Condition of bulk storage tanks:

OK

Date 8/30/00

Time 9:30

Signature

[Signature]

Distribution:

D. Goodwin L. Guillot L. Rivere J. Whitley H. Murphy File

ENVIRONMENTAL HAZARDOUS WASTE INSPECTION REPORT



## POLLUTION PREVENTION INSPECTION REPORT

(Hazardous Waste Accumulation Area / Bulk Tank Storage Areas)

Site or Job Location: ARCAUSAS PASS YARD

- |     |   |            |           |
|-----|---|------------|-----------|
| 1.  | Any evidence of leaking containers?   | Yes        | <u>No</u> |
| 2.  | Any evidence of deterioration of containers caused by corrosion or other factors? | Yes        | <u>No</u> |
| 3.  | All containers properly labeled?  | <u>Yes</u> | No        |
| 4.  | Labels clearly visible?   | <u>Yes</u> | No        |
| 5.  | Aisle space open and clear of obstruction?  | <u>Yes</u> | No        |
| 6.  | All bungs and lids on and tight?<br>(except for adding to or filling operations)  | <u>Yes</u> | No        |
| 7.  | "No Smoking" and "Hazardous Waste Accumulations Area" signs in place?             | <u>Yes</u> | No        |
| 8.  | Spill control equipment in place?   | <u>Yes</u> | No        |
| 9.  | Storage dates under the 90 day limit?   | <u>Yes</u> | No        |
| 10. | Incompatible waste separated properly?  | <u>Yes</u> | No        |
| 11. | Grass and or weeds mowed?   | <u>Yes</u> | No        |

12. Condition of containment facility:

OK

12. Condition of bulk storage tanks:

OK

Date 9/7/00

Time 2:30

Signature

*[Handwritten Signature]*

Distribution:

D. Goodwin L. Guillot

L. Rivere

J. Whitley

H. Murphy

File

G:\ENVIRON\WASTE\HAZINSPECT\N.RPT



## POLLUTION PREVENTION INSPECTION REPORT

(Hazardous Waste Accumulation Area / Bulk Tank Storage Areas)

Site or Job Location: ARKANSAS PASS YARD

- |  |                                      |                                     |
|--|--------------------------------------|-------------------------------------|
| 1. Any evidence of leaking containers?   | Yes                                  | <input checked="" type="radio"/> No |
| 2. Any evidence of deterioration of containers caused by corrosion or other factors? | Yes                                  | <input checked="" type="radio"/> No |
| 3. All containers properly labeled?  | <input checked="" type="radio"/> Yes | No                                  |
| 4. Labels clearly visible?   | <input checked="" type="radio"/> Yes | No                                  |
| 5. Aisle space open and clear of obstruction?  | <input checked="" type="radio"/> Yes | No                                  |
| 6. All bungs and lids on and tight?<br>(except for adding to or filling operations)  | <input checked="" type="radio"/> Yes | No                                  |
| 7. "No Smoking" and "Hazardous Waste Accumulations Area" signs in place?             | <input checked="" type="radio"/> Yes | No                                  |
| 8. Spill control equipment in place?   | <input checked="" type="radio"/> Yes | No                                  |
| 9. Storage dates under the 90 day limit?   | <input checked="" type="radio"/> Yes | No                                  |
| 10. Incompatible waste separated properly?   | <input checked="" type="radio"/> Yes | No                                  |
| 11. Grass and or weeds mowed?  | <input checked="" type="radio"/> Yes | No                                  |

12. Condition of containment facility:

OK

12. Condition of bulk storage tanks:

OK

Date 9/16/00

Time 3:00

Signature

*[Handwritten Signature]*

Distribution:

D. Goodwin L. Guillot

L. Rivere

J. Whitley

H. Murphy

File

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61 041

Aker Gulf Marine - Aransas Pass Yard  
TNRCC ID No. 37946  
EPA ID No. TXD121488902  
Compliance Evaluation Investigation Conducted January 11 and 22, 2001

Attachment 5  
Correspondence From the Facility

Site Diagram  
Location of Hazardous Waste Satellite Accumulation Areas

61 043



TOTAL AREA	647.2
COVERED FABRICATION AREAS	8,367
WAREHOUSES	3,992
OFFICES	1,560
MAINTENANCE	603.6
STORAGE AREA	202.1
FABRICATION AREA	323.7

### SHOP FACILITIES

PIPE ROLLING MILL  
PIPE FABRICATION SHOP  
FABRICATION SHOPS  
COMPUTERIZED BRACE COPIING SHOP

### WATERFRONT FACILITIES

SHEET-PILE BULKHEAD	304.E
WATER DEPTH AT FACE OF DOCK	
SEA ACCESS	INTRA
	14.7
RAIL ACCESS	SOUT
ROAD ACCESS	FM 2

ARANSAS PASS YARD LOCATION PLAN 1

FIRST CHARACTER

### SECOND & THIRD CHARACTER

FOURTH &amp; FIFTH CHARACTER

### SIXTH CHARACTER

SEWER PLANT = AAXDOW  
GUARD HOUSE = ABD12N

SCAN

0°

10

0	FOOD FOR ILLUSTRATION	JR		
NO.	REVISION	BY	DATE	



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
FY 2001 MULTI-MEDIA TRACKING FORM

Facility/Source Name: Aker Gulf Marine - Aransas Pass Yard

Address: FM 2725, 2 miles north of FM 1069  
Aransas Pass, Texas 78362-1302

County: San Patricio Region: 14 Office: Corpus Christi

Use E-mail address for inspector name

AGRI \_\_\_\_\_ AIR \_\_\_\_\_

IHW SPARR MSW \_\_\_\_\_

PST SPARR PWS \_\_\_\_\_

WSM RJUAREZ UIC \_\_\_\_\_

Inspection Media	ID Number (Permit, Registration, Account, Facility Id #, etc. - as applicable)	Inspection Date(s) (begin/end)	Violations Discovered? (Yes/No)	VIOLATIONS ADDRESSED BY (check all that apply): do not use a checkmark - date must be used			
				Regional NOV (date)	Regional BCA (date)	Regional Order (date)	Referral to Central Office (date of referral)
Agriculture							
Air							
IHW - Hazardous or Industrial Solid	37946	01-11-2001/01-22-2001	Yes/Verbal				
IHW - UIC							
IHW- Radioactive							
Municipal Waste							
Petroleum Storage Tank	52284	01/29/2001	Yes/Verbal				
Public Water Supply							
Water Quality	03012	01/25/2001	Yes				

FY 2001 - E-Mail to JBARBEE  
Attach copy to the report

REVISED 9-98 dr